

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(SPARTANBURG DIVISION)**

JANE DOES 1 - 9, )  
Plaintiff/Petitioner/USA, ) Case No. 7: 21-cv-03193-DCC  
 )  
 )  
v. ) Application/Affidavit for  
LIMESTONE UNIVERSITY ) Pro Hac Vice Admission  
F/K/A LIMESTONE COLLEGE, ET AL., )  
Defendant/Respondent. )  
 )

(1) Name. Elinor \_\_\_\_\_ Catherine \_\_\_\_\_ Sutton \_\_\_\_\_  
First Middle Last

(2) Residence. I reside in the following state: Texas  
If a South Carolina resident, indicate months/years of residence: N/A

(3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Quinn Emanuel Urquhart & Sullivan, LLP

Mailing address: 3100 McKinnon St. City/State/Zip: Dallas, TX 75201

Telephone number: (469) 902-3600

Facsimile number: (469) 902-3610

E-mail address: [elinorsutton@quinnmanuel.com](mailto:elinorsutton@quinnmanuel.com)

(Application will not be considered without an e-mail address to receive electronic notification.)

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.<sup>1</sup>

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of Texas where I regularly practice law. **Attached is my certificate of good standing.**

(6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

<sup>1</sup>This District maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules of procedure and related materials may be obtained.

<b>Court</b>	<b>Date Admitted</b>	<b>Good Standing</b>
<u>See Attachment</u>		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

(7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? .....  Yes  No  
 (If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

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(8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?  
 Yes  No  
 (If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

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(9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?  
 Yes  No  
 (If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

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(10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  
 Yes  No  
 (If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

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(11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?  
 Yes  No  
 (If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.  
(1 of 1): United States District Court for the District of South Carolina, Spartanburg Division,  
Jane Doe v. Collins Murphy, et al., Case No. 7: 20-CV-00947-DCC  
(consolidated for purposes with the instant case for discovery), same local counsel of record as  
indicated in No. (12) below, application submitted concurrently with the instant application.

(12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name: Mark Goddard; J. Kenneth Carter  
 Firm Name: Turner Padget Graham and Laney, P.A.  
 Street Address or Post Office Box: Post Office Box 1509  
 City, State, and Zip Code: Greenville, South Carolina 29602  
 Telephone Number: (803) 227-4334; (803) 400-1542  
 E-Mail Address: kcartier@turnerpadget.com

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

(13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

Diane L. Cafferata, Michael E. Williams, Robert J. Becher of Quinn Emanuel Urquhart & Sullivan, LLP

(14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

(15) Electronic Notification. By submitting this application, I consent to electronic notification.

(16) Represented Party/Parties. I seek to represent the following party/parties:  
MG Freesites, LTD., MG Freesites II LTD., MindGeek S.A.R.L., MindGeek USA, Inc.

(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.



\_\_\_\_\_  
 Signature of Applicant

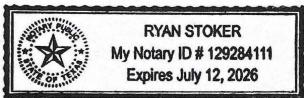
Before me, the undersigned authority, personally appeared by means of an interactive two-way audio and video communication, Elinor Sutton, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements therein contained are true and correct. This notarial act was an online notarization.

SIGNED ON THIS 6th day of March, 2024.



\_\_\_\_\_  
 A Notary Public  
 of the State of Texas

My Commission expires: 07/12/2026



**ELINOR C. SUTTON COURT ADMISSIONS**

COURT NAME	ADMITTED DATE	GOOD STANDING
NY State Bar	7/1/2008	YES
Texas State Bar	7/21/2022	YES
Eastern District of New York	10/24/2008	YES
Southern District of New York	10/7/2008	YES
Northern District of Texas	3/13/2023	YES
5 <sup>th</sup> Circuit Court of Appeals	10/6/2023	YES
2 <sup>nd</sup> Circuit Court of Appeals	8/9/2023	YES

# STATE BAR OF TEXAS



*Office of the Chief Disciplinary Counsel*

March 06, 2024

Re: Elinor Catherine Sutton, State Bar Number 24129804

To Whom It May Concern:

This is to certify that Elinor Catherine Sutton was licensed to practice law in Texas on July 21, 2022, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Seana Willing  
Chief Disciplinary Counsel  
SW/web



# Sutton PHV for -193 (1)

Final Audit Report

2024-03-06

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